

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Case No. WDQ-02-CV-648

EQUAL EMPLOYMENT OPPORTUNITY)
COMMISSION,)
)
Plaintiff,)
)
v.)
)
LA WEIGHT LOSS,)
)
Defendant.)
)

JOINT MOTION TO EXTEND EXPERT DISCOVERY AND MODIFY SCHEDULE

Pursuant to the Federal Rules of Civil Procedure, Rule 105 of the Local Rules of the United States District Court for the District of Maryland and the Court's May 25, 2004, Order Regarding Bifurcation and Scheduling (the "Order"), Plaintiff U.S. Equal Employment Opportunity Commission and Defendant LA Weight Loss Centers, Inc. (the "Parties") respectfully request that the Court enter a limited order extending all expert discovery dates in this matter, as well as the dates for filing of dispositive motions, oppositions and cross-motions, by one (1) month.

In support of this Motion, the Parties state that Plaintiff EEOC has recently learned, and has informed Defendant, that an expert EEOC has employed in this case is having a family medical emergency which, coupled with related care-giving responsibilities and professional responsibilities, has rendered that expert unable to provide a Rule 26 report on April 24th, which is the date that EEOC is required to provide such reports to Defendant under the current scheduling order. The Parties agree that these circumstances warrant a brief extension of the current scheduling order dates

by one (1) month.

Accordingly, for good cause shown, the Parties request that the Order be modified as follows:

Plaintiff EEOC shall name expert witnesses and serve Defendant LA Weight Loss Centers, Inc. with expert report(s) on or before May 26, 2006; Defendant LA Weight Loss Centers, Inc. shall name expert witnesses and serve Plaintiff EEOC with expert report(s) on or before June 26, 2006; expert discovery shall be completed by August 25, 2006; dispositive motions with respect to Stage I issues shall be filed on or before September 25, 2006; and Plaintiff EEOC shall file its opposition and cross motion, if any, on or before October 25, 2006.

Respectfully submitted,

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION

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